

Honorable James M. Peck
One Bowling Green
New York, New York 10004
Courtroom 601

*This response is directed to the Objection titled "OMNIBUS OBJECTION TO CLAIMS
(LATE-FILED LEHMAN PROGRAMS SECURITIES CLAIMS)" related to the following
claim:*

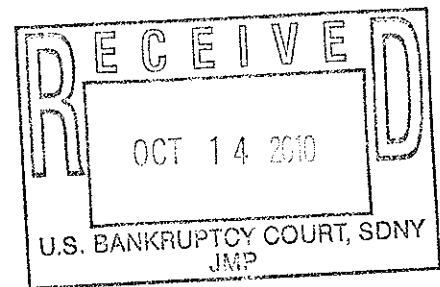
Creditor Name and Address:

EUROMIX SICAV, SA
Avenida Madrid, 77-10-A
LOGRONO, 26006, SPAIN

Claim Number: 64315

Date Filed: 11/3/2009

Debtor: 08-13555



Lehman Brothers Holding Inc. and certain of its affiliates

Bankruptcy Court: *Unites States Bankruptcy Court for the Southern District of New York*

Classification and Amount: UNSECURED: \$ 141,510.00

Address to reply to this response:

Ibáñez de Bilbao 9 Bajo
48009 Bilbao (Spain)
Phone: +34 94.4000.300 / Fax: +34 94.4000.342

Person possessing ultimate authority to resolve the claim:

Mr. Jose Luis Amézaga (or any other person duly authorised).
Ibáñez de Bilbao 9 Bajo
48009 Bilbao (Spain)
Phone: +34 94.4000.300 / Fax: +34 94.4000.342

Mr. Pedro Echano and Mr. Jose Luis Amézaga, acting on behalf of Euromix Sicav S.A.,
in connection with the claim listed above and regarding your notice dated September
13, 2010, declares that:

We do not agree with that notice which stated that our claim violates the Bankruptcy
Court's July 2, 2009 order setting forth the procedures and deadlines for filing proofs of
claim and so we oppose the disallowance, expungement, reduction or reclassification
of this claim, on the grounds of the following reasons:

1. - The proofs of the debt and the claim were made before the mentioned deadline set by the Bankruptcy Court.

The claim listed above was remitted by registered mail on October 26, 2009 as it is shown in the attached documents (See annex 1).

This document proves that the date in which the claim was deposit (October 26, 2010), along with the documentation proving the existence and amount of the debt claimed, was well ahead of the one set as the deadline for filling proofs of claim (November 2, 2010).

The certified proof of remittance within the deadline mentioned should be enough to accept that the claim was made on time. The final reception of the claim could have been delayed for reasons out of our responsibility, so it is the date of dispatch what should be taken into account to accept this claim given the circumstances.

Consequently, it is reasonable to consider that the proof of the debt and the subsequent claim of Euromix Sicav S.A. against Lehman Brothers Holding Inc. were filed on time.

2. -The claim was received before the mentioned deadline.

The reception date for this claim in accordance to your notice is November 3, 2010, one day after the deadline. Most certainly this delay could have been caused by an error.

The claim of Euromix Sicav S.A. against Lehman Brothers Holding Inc. was remitted on the same date as the one of Hupasa de Valores Mobiliarios Sicav S.A. (also represented by us) against the same debtor, a fact that is proved by the attached document mentioned previously (See annex 2).

It is not acceptable that despite having been made on the same days, these communication remittances have arrived on two different days. Consequently, any possible delay on the reception of the communication must be under the responsibility of the receptor, not the sender.

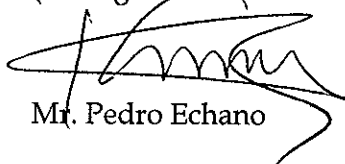
On the other hand, we have noticed that the claim numbers assigned to both claims are really far from each other. The claim number of Hupasa de Valores Mobiliarios Sicav S.A. is 61360 while the one assigned to Euromix Sicav S.A. is 64315 (See annex 3). This led us to think that there must have been an error or a delay in the reception procedures, and so it is not acceptable to hold the society I represent responsible for it.

Consequently, it is reasonable that the claim of Euromix Sicav S.A. against Lehman Brothers Holding Inc. is considered to have been made on time.

As a result of what has been stated here, owing to the reasons exposed in this notice and the documents attached to it, I request the recognition and acceptance that the proof of the debt and the subsequent claim of Euromix Sicav S.A. against Lehman Brothers Holding Inc. have been filed on time and everything it entails.

October 13, 2010. Bilbao, Spain

GIIC FINECO
S.G.I.I.C., S.A.U
(Acting on behalf of EUROMIX SICAV, SA)



Mr. Pedro Echano

Authorised Signatory



Mr. Jose Luis Amézaga

Authorised Signatory

CORREOS

RR511098375ES CIF: A83052407 OFICINA: 4800010 - BILBAO OP

REMITENTE/ADONZATEA
D/Nor **EUROMIX SICAV SA** NIE/IFZ

DESTINATARIO/HARTZATEA
D/Nor **LENTAN BROTHERS HOLDING LTD**
C/Kalea **CPLO BANK PORTY SOLUTIONS, LLC** Piso/Solairua
Población/Herrria **For Station Postbox 0976**
CP/PK **10110 New York** País/Herrrialdea **USA**

Carta Certificada
Fecha: 26/10/2009 Aviso de recibo: 1,25 €
Peso: 153 gr
Hora: 17:56
Importe: 18,74 €

Sello de fechas o validación mecánica/Daten zegilua edo baliozkotze mekanikoa

www.correos.es

MODALIDAD MODALITATEA
CANTIDAD CANT
NOVA NOVA

Reembolso internacional/Nazarteko pako ordaintza
Importe/ Zerbatekoa 18,74 €
Zerbatekoa 18,74 €

SAP 401843 / Cálculo 2009/10

CORREOS Y TELEGRAFOS
CIF: A83052407
COD. OFICINA: 4800010
BILBAO OP
No: 480001020091026226081
Fec: 26/10/09
CRR511098375ES) EUROMIX
1 CARTA CERTIFICADA 7,49 SICAV SA
* - ACUSE DE RECIB 1,25
CRR511098389ES) HUPASA
1 CARTA CERTIFICADA 11,84 SICAV SA
* - ACUSE DE RECIB 1,25
Total Euros ... : 21,83
(*) Incluido
Entr. Euros ... : 50,00
Dvto. Euros ... : 28,17

26/10/09 17:57
C019671

CORREOS

Espacio para el código de barras
Barra-koderako kodea

RR511098389ES CIF:A83052407 OFICINA: 4800010 - BILBAO.OP

REMITENTE/EMITITZAILEA
D/Nº **FINEO CIA** **HUPASA SICAV SANITIZ**

DISTINATARIO/HEMATZAILEA
D/Nº **Lehman Brothers Holding** **Lehman Brothers**
210 EPI Bank **Options**
CP/Kalea **FD Station** **P.O. Box 5575** **Piso Solarrua**
Población/Herrria **New York** **10150-5575**
CP/PK **Provincia/Lurraldea** **País/Herrrialdea** **USA**

Carta Certificada
Fecha: 26/10/2009 Aviso de recibo: 1,25 €
Peso: 245 gr.
Hora: 17:57
Importe: 13,09 €

Sello de fechas o validación mecánica/Daten zigilua edo baliozko ze mekanikoa

MODALIDAD MODALITATEA
CLASE MOIA
Código Postal Kode Postala
País Paísa
Reembolso Internacional Nazioarteko isurorleketa
Importe/ Zehaztekoa
€
€

www.correos.es

SAP 4018437/Garantia-2009/EU

CORREOS Y TELEGRAFOS
CIF: A83052407
COD. OFICINA: 4800010
BILBAO OP
No: 480001020091026226081
Fec: 26/10/09
CAR511098375ES) EUROMIX
1 CARTA CERTIFICADA 7,49 SICAV SA
* - ACUSE DE RECIB 1,25
CAR511098389ES) HUPASA
1 CARTA CERTIFICADA 11,84 SICAV SA
* - ACUSE DE RECIB 1,25

Total Euros ... : 21,83
(*) Incluido
Entr. Euros ... : 50,00
Dvto. Euros ... : 28,17

26/10/09 17:57
C019671

United States Bankruptcy Court/Southern District of New York
Lehman Brothers Holdings Claims Processing Center
c/o Epiq Bankruptcy Solutions, LLC
FDR Station, P.O. Box 5076
New York, NY 10150-5076

In Re:

Lehman Brothers Holdings Inc., et al.,
Debtors.

Chapter 11

Case No. 08-13555 (JMP)
(Jointly Administered)

Note: This form may not be used to file claims other than those
based on Lehman Programs Securities as listed on
<http://www.lehman-docket.com> as of July 17, 2009

LEHMAN SECURITIES PROGRAMS PROOF OF CLAIM

Filed: USBC - Southern District of New York
Lehman Brothers Holdings Inc., Et Al.
08-13555 (JMP) 0000061360



THIS SPACE IS FOR COURT USE ONLY

Name and address of Creditor: (and name and address where notices should be sent if different from Creditor)

HUPASA DE VALORES MOBILIARIOS SICAV, SA
C/ IBANEZ DE BILBAO, 9
48009- BILBAO SPAIN

☐ Check this box to indicate that this
claim amends a previously filed claim.

Court Claim Number: _____
(If known)

Filed on: _____

Telephone number: +34 94 4000 300 Email Address: GESTORA@FINECO.COM

Name and address where payment should be sent (if different from above)

☐ Check this box if you are aware that
anyone else has filed a proof of claim
relating to your claim. Attach copy of
statement giving particulars.

Telephone number:

Email Address:

1. Provide the total amount of your claim based on Lehman Programs Securities. Your claim amount must be the amount owed under your Lehman Programs Securities as of September 15, 2008, whether you owned the Lehman Programs Securities on September 15, 2008 or acquired them thereafter, and whether such claim matured or became fixed or liquidated before or after September 15, 2008. The claim amount must be stated in United States dollars, using the exchange rate as applicable on September 15, 2008. If you are filing this claim with respect to more than one Lehman Programs Security, you may attach a schedule with the claim amounts for each Lehman Programs Security to which this claim relates.

Amount of Claim: \$ 99,057 (Required)

☐ Check this box if the amount of claim includes interest or other charges in addition to the principal amount due on the Lehman Programs Securities.

2. Provide the International Securities Identification Number (ISIN) for each Lehman Programs Security to which this claim relates. If you are filing this claim with respect to more than one Lehman Programs Security, you may attach a schedule with the ISINs for the Lehman Programs Securities to which this claim relates.

International Securities Identification Number (ISIN): XS0273666437 (Required)

3. Provide the Clearstream Bank Blocking Number, a Euroclear Bank Electronic Reference Number, or other depository blocking reference number, as appropriate (each, a "Blocking Number") for each Lehman Programs Security for which you are filing a claim. You must acquire a Blocking Number from your accountholder (i.e. the bank, broker or other entity that holds such securities on your behalf). If you are filing this claim with respect to more than one Lehman Programs Security, you may attach a schedule with the Blocking Numbers for each Lehman Programs Security to which this claim relates.

Clearstream Bank Blocking Number, Euroclear Bank Electronic Instruction Reference Number and or other depository blocking reference number:

6020387

(Required)

4. Provide the Clearstream Bank, Euroclear Bank or other depository participant account number related to your Lehman Programs Securities for which you are filing this claim. You must acquire the relevant Clearstream Bank, Euroclear Bank or other depository participant account number from your accountholder (i.e. the bank, broker or other entity that holds such securities on your behalf). Beneficial holders should not provide their personal account numbers.

Accountholders Euroclear Bank, Clearstream Bank or Other Depository Participant Account Number:

99939 EUROCLEAR

(Required)

5. Consent to Euroclear Bank, Clearstream Bank or Other Depository: By filing this claim, you consent to, and are deemed to have authorized, Euroclear Bank, Clearstream Bank or other depository to disclose your identity and holdings of Lehman Programs Securities to the Debtors for the purpose of reconciling claims and distributions.

Date:

23/10/2010

Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.


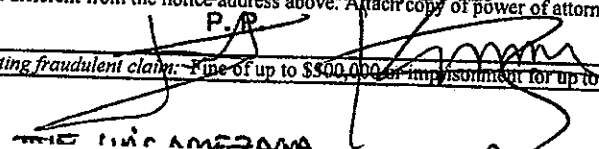
FILED/RECEIVED

NOV 02 2009

EPIQ BANKRUPTCY SOLUTIONS, LLC

Penalty for presenting fraudulent claim. Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571

THE HUPASA AMERZAGA PEDRO M. FERNANDEZ

United States Bankruptcy Court/Southern District of New York Lehman Brothers Holdings Claims Processing Center c/o Epiq Bankruptcy Solutions, LLC FDR Station, P.O. Box 5076 New York, NY 10150-5076		LEHMAN SECURITIES PROGRAMS PROOF OF CLAIM	
In Re: Lehman Brothers Holdings Inc., et al., Debtors,	Chapter 11 Case No. 08-13555 (JMP) (Jointly Administered)	Filed: USBC - Southern District of New York Lehman Brothers Holdings Inc., Et Al. 08-13555 (JMP) 0000064315	
Note: This form may not be used to file claims other than those based on Lehman Programs Securities as listed on http://www.lehman-docket.com as of July 17, 2009			
Name and address of Creditor: (and name and address where notices should be sent if different from Creditor) EUROTIX SICAV, SA AVENIDA MADRID, 77-10º A 26006 - LOGROÑO SPAIN		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim. Court Claim Number: _____ (if known) Filed on: _____	
Telephone number: _____ Email Address: _____ Name and address where payment should be sent (if different from above) EUROTIX SICAV, SA. C/IBATZ DE BILBAO 9 48009 BILBAO SPAIN		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.	
Telephone number: +34944000300 Email Address: GESTORA@FINECO.COM			
<p>1. Provide the total amount of your claim based on Lehman Programs Securities. Your claim amount must be the amount owed under your Lehman Programs Securities as of September 15, 2008, whether you owned the Lehman Programs Securities on September 15, 2008 or acquired them thereafter, and whether such claim matured or became fixed or liquidated before or after September 15, 2008. The claim amount must be stated in United States dollars, using the exchange rate as applicable on September 15, 2008. If you are filing this claim with respect to more than one Lehman Programs Security, you may attach a schedule with the claim amounts for each Lehman Programs Security to which this claim relates.</p> <p>Amount of Claim: \$ <u>141510</u> (Required)</p> <p><input type="checkbox"/> Check this box if the amount of claim includes interest or other charges in addition to the principal amount due on the Lehman Programs Securities.</p>			
<p>2. Provide the International Securities Identification Number (ISIN) for each Lehman Programs Security to which this claim relates. If you are filing this claim with respect to more than one Lehman Programs Security, you may attach a schedule with the ISINs for the Lehman Programs Securities to which this claim relates.</p> <p>International Securities Identification Number (ISIN): <u>XS0234421914</u> (Required)</p>			
<p>3. Provide the Clearstream Bank Blocking Number, a Euroclear Bank Electronic Reference Number, or other depository blocking reference number, as appropriate (each, a "Blocking Number") for each Lehman Programs Security for which you are filing a claim. You must acquire a Blocking Number from your accountholder (i.e. the bank, broker or other entity that holds such securities on your behalf). If you are filing this claim with respect to more than one Lehman Programs Security, you may attach a schedule with the Blocking Numbers for each Lehman Programs Security to which this claim relates.</p> <p>Clearstream Bank Blocking Number, Euroclear Bank Electronic Instruction Reference Number and or other depository blocking reference number: <u>CA34569</u> (Required)</p>			
<p>4. Provide the Clearstream Bank, Euroclear Bank or other depository participant account number related to your Lehman Programs Securities for which you are filing this claim. You must acquire the relevant Clearstream Bank, Euroclear Bank or other depository participant account number from your accountholder (i.e. the bank, broker or other entity that holds such securities on your behalf). Beneficial holders should not provide their personal account numbers.</p> <p>Accountholders Euroclear Bank, Clearstream Bank or Other Depository Participant Account Number: <u>17892</u> <u>EUROCLEAR</u> (Required)</p>			
<p>5. Consent to Euroclear Bank, Clearstream Bank or Other Depository: By filing this claim, you consent to, and are deemed to have authorized, Euroclear Bank, Clearstream Bank or other depository to disclose your identity and holdings of Lehman Programs Securities to the Debtors for the purpose of reconciling claims and distributions.</p>		<p>FOR COURT USE ONLY FILED / RECEIVED NOV 03 2009 EPIC BANKRUPTCY SOLUTIONS LLC</p>	
Date: <u>23/10/2010</u>	Signature: The person filing this claim must sign in Signature print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.  P. R.		
Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571			

SPANISH VERSION OF THE WRITTEN RESPONSE TO THE OBJECTION

This response is directed to the Objection titled "OMNIBUS OBJECTION TO CLAIMS (LATE-FILED LEHMAN PROGRAMS SECURITIES CLAIMS)" related to the following claim:

Creditor Name and Address:

EUROMIX SICAV, SA
Avenida Madrid, 77-10-A
LOGRONO, 26006, SPAIN

Claim Number: 64315

Date Filed: 11/3/2009

Debtor: 08-13555

Lehman Brothers Holding Inc. and certain of its affiliates

Bankruptcy Court: *Unites States Bankruptcy Court for the Southern District of New York*

Classification and Amount: UNSECURED: \$ 141,510.00

Address to reply to this response:

Ibáñez de Bilbao 9 Bajo
48009 Bilbao (Spain)
Phone: +34 94.4000.300 / Fax: +34 94.4000.342

Person possessing ultimate authority to resolve the claim:

Mr. Jose Luis Amézaga (or any other person duly authorised).

Ibáñez de Bilbao 9 Bajo
48009 Bilbao (Spain)

Phone: +34 94.4000.300 / Fax: +34 94.4000.342

Don Pedro Echano y Don Jose Luis Amezaga, en nombre y representación de
Euromix SICAV, SA,

Declaran

Que no está conforme con su comunicación de fecha 13 de septiembre de 2010 de que la reclamación y justificación de su crédito se haya efectuado después de la fecha prevista para la recepción de las comunicaciones de los acreedores y se opone a ello y a cuanto de ello derive en base a los siguientes

Motivos

1º.- La reclamación y justificación del crédito se ha efectuado en tiempo hábil.

La remisión por sistema certificado se ha efectuado con fecha 26 de octubre de 2009, lo que se acredita con el documento del envío de la comunicación en que figura que dicha fecha. (Anexo 1).

Lo que importa a efectos de la reclamación y justificación de los créditos es la constancia de que la comunicación se ha efectuado dentro del plazo establecido al efecto y tal constancia es la resulta del citado documento (Anexo 1).

En dicho documento se recoge que la fecha en que fue depositada la comunicación de la reclamación junto con la documentación demostrativa de la existencia y cuantía del crédito (26 de octubre de 2009) es muy anterior a la fecha de cierre de las recepciones (2 de noviembre de 2009).

La constancia fehaciente del envío de la reclamación en el plazo establecido es suficiente para aceptar que se ha cumplido con el requerimiento de efectuar la comunicación en dicho plazo.

La recepción de la comunicación del acreedor puede demorarse por causa ajenas, por lo que lo que ha tenerse en cuenta es la fecha de remisión en tiempo hábil. Tal circunstancia resulta acreditada con el documento aportado. (Anexo 1).

Consiguientemente, la reclamación y justificación del crédito de Euromix SICAV, SA contra Lehman Brothers Holding Inc. se ha efectuado en tiempo hábil.

2º.- La recepción de la comunicación de la reclamación y justificación del crédito se ha efectuado en tiempo igualmente hábil.

La fecha de recepción de la comunicación figura la del día 3 de noviembre de 2010, un día después de la fecha en que finalizaba el plazo para reclamación y justificación de los créditos, lo que sin duda debe ser un error.

La remisión de la comunicación de la reclamación y justificación del crédito de Euromix SICAV, SA contra Lehman Brothers Holding Inc. se efectuó en la misma fecha en que se efectuó la del crédito de Hupasa de Valores Mobiliarios SICAV, SA contra Lehman Brothers Holding Inc., lo que se acredita con copia de dicho envío. (Anexo 2).

No es aceptable que dos envíos de comunicaciones de créditos efectuadas en la misma fecha lleguen en fecha diferente, por lo que es responsabilidad del receptor y no del comunicante, el retraso que pueda sufrir la recepción del envío.

Por otra parte, observamos que la numeración de entrada entre ambas comunicaciones de créditos está muy alejada, lo que hace suponer que ha podido haber errores/retrasos en la operativa de la recepción de las comunicaciones. El número del registro de entrada de la comunicación del crédito de Hupasa de Valores Mobiliarios SICAV, SA es 61.360 y la de Euromix SICAV, SA es de 64.315 (Anexo 3)

No puede, por ello, responsabilizarse a mi representada de lo que haya podido ocurrir en la recepción de la comunicación del crédito de Euromix SICAV, SA.

Consiguientemente, la reclamación y justificación del crédito de Euromix SICAV, SA. contra Lehman Brothers Holding Inc. se ha efectuado en tiempo hábil.

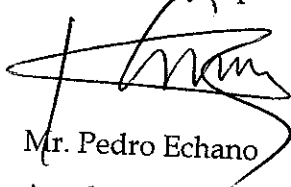
En virtud de los expuesto,

Solicito que, atendidos los motivos alegados en este escrito y con soporte en los documentos aportados, **se reconozca que la comunicación de la reclamación y justificación del crédito de Euromix SICAV, SA. contra Lehman Brothers Holding Inc. ha sido efectuada dentro del plazo.**

En Bilbao, a 13 de octubre de 2010.

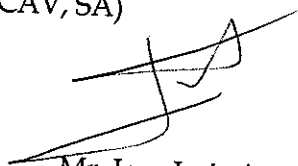
GIIC FINECO S.G.I.I.C., S.A.U

(en nombre y representación de EUROMIX SICAV, SA)



Mr. Pedro Echano

Apoderado



Mr. Jose Luis Amézaga

Apoderado